

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 12/04/02 – 1500 pm

Site Contact(s): Duane Parsons (D&D) – (DAP-005)
Phone: (303) 966-6458

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Type 1 RLCR Concurrence for B112 and B367

Meeting Attendance

D A Parsons, D&D	D Kruchek, CDPHE	S Tower, RFFO
C Freiboth, K-H	L Umbaugh, Canberra	E Kray, CDPHE
J Hindman, CDPHE		

Discussion

On December 4, 2002, at 1430 pm, D Parsons presented responses to comments received via email from the State (D Kruchek) concerning Type 1 Facility Reconnaissance Level Characterization Reports (RLCRs) for facilities 112, 367, 334, T371D, T441A, T121A and 553. Below are the CDPHE comments and K-H responses.

1) B334 - What were all of the various vent lines used for? This includes the ones on the second floor as well as the ones in the high-bay area. Could the ventilation system contain contamination? Contamination being not just rads but metals such as lead, cadmium, chromium, beryllium, etc. This could be a concern not only because of "normal" operations, but because of past operations utilizing the equipment and materials brought from other buildings such as B444 and B881. Just want to make sure this possible concern has been properly addressed prior to removal and demolition.



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ADMIN RECORD
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CEX-105-01

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K-H Response

The various vent lines, including the second floor vent lines, were utilized for ventilating the work spaces where welding and other metal work operations took place. The vent lines were directed to the outside atmosphere without filtration. The hoses located on the first floor high bay west-side, were connected to woodworking equipment such as a table saws. The hoses ran into a vacuum pump that was then exhausted to a collection hopper located outside of the west wall. The collection hopper collected saw dust and once the hopper was full its contents were then dumped into 55 gallon drums for disposal as sanitary waste. It is unlikely that the ventilation systems would have become contaminated due to past operations, however, additional surveys and samples have recently been collected in the ventilation ducting and collection hopper. The additional Rad and Be survey and sample results were all below the PDSP release criteria and will be provided to you for review. A metals sample was obtained in a vent duct, results will be provided to DOE and CDPHE upon receipt from the offsite lab.

2) B334 - Need to determine possible concerns/contamination in the floor trenches

K-H Response

There is just one floor trench in 334. The wood covering the trench was removed, revealing a dry trench about 8 inches deep by 8 inches wide by 8 feet long. The trench was surveyed and sampled for rad and Be, based on a visual inspection, chemical metals sampling was not necessary. These additional survey and sample results were all below PDSP release criteria and will be provided to you for review.

3) B334 - Could not determine the concerns with the floor in the oil storage room, but based on the info contained in the RLCR can not recycle the oil stained concrete, unless samples show that it does not contain hazardous constituents (VOCs, SVOCs, or metals)

K-H Response

The concrete floor of the B334 oil storage room will not be utilized for onsite recycle material.

4) B334 - Still have a concern with the potential radiological contamination identified in the floor samples

K-H Response

This issue will be discussed in detail during a meeting on December 11th, 2002 and the meeting minutes will be documented in a Contact Record. CDPHE radiological concerns will be discussed and should be resolved at this meeting.

5) B112 - Did not see any bricks, neither lead or cadmium bricks were

seen, which were indicated in the HSA to have been in this building As we discussed this should have been properly included in the RLCR, Section 4 3

K-H Response

All of the lead and cadmium bricks were recently removed from B112 when the Dosimetry Group was relocated last month (November 2002) Section 4 3 of the RLCR has been revised to include a discussion of the removal of the bricks

6) B112 - The utility trenches/tunnels need to be properly characterized

K-H Response

The B112 utility trenches/tunnels were surveyed and sampled for rad and Be Based on a visual inspection, chemical sampling was not necessary The additional rad and Be survey and sample results were all below PDSP release criteria and will be provided to you for review

7) B367 - The concrete slab may contain hazardous constituents (herbicides, pesticides, metals, etc) from the various chemicals that have been stored and spilled in this building As such it can not be recycled without appropriate sampling

K-H Response

The concrete floor of B367 will not be utilized for onsite recycle material

8) B553 - What are contained in the drains in the concrete floor?

Appropriate characterization should be performed

Without proper sampling and characterization the slab can not be recycled

K-H Response

During the 1950's and 1960's building 553 used for storage of chemicals in drums and other liquids such as nitrogen (e g , a chemical dispensary) B553 contains three trenches in the floor that are approximately 4 inches deep, by 12 inches wide by 16 feet long The three trenches were aligned under the front edges of the drum storage racks The drums were on their sides in the drum racks for dispensing their contents There was a drain in the bottom of each the trenches There were also two cleanout ports in the B553 slab that connected to the trenches The trenches drained into a retention basin located approximately 50 east of B553 through a pipe that exited the building to the east The area where the retention basin once existed is now covered over with asphalt and connex boxes The three B553 trenches were filled in with concrete (except for the drain openings) during the late 1960's Additional surveys and samples have recently been collected in the B553 trenches, drains and cleanout ports The additional rad and Be survey and sample results were all below the PDSP release criteria and will be provided to you for review

Six chemical samples, and one duplicate, were obtained in the 553 trenches, results will be provided to DOE and CDPHE upon receipt from the offsite lab. The concrete floor of B553 will not be utilized for onsite recycle material if the chemical samples are above the PDSP release criteria.

9) T371D - Need to resolve the high levels of radiological detections found from the roof coupon, see the RLCR

K-H Response

A gamma spectroscopy analysis was performed on sample numbers 03S006-001 001 (metal coupon from T371D roof) and 03S0013-005 001 (composite sample of four metal coupons from T441A and T121A roofs). CDPHE expressed concerns with the reported value for Ra-226 in these samples. The initial reported values for Ra-226 were conservative such that the values were not manually interference corrected (i.e., the initial Ra-226 values consisted of Ra-226 activity plus composite U-235 activity), thus the Ra-226 values were overly conservative. The Ra-226 component of these samples were reanalyzed and the interference corrected values were determined (Ra-226 activity only). These reanalyzed values will be reflected in the RLCRs for these buildings.

The reanalysis performed of RIN# 03S006-001 001 revised the initially reported Ra-226 value from 2.56×10^1 pCi/g with a 2-sigma of 1.13×10^1 and an MDA of 1.86×10^1 to a revised value of 0.00×10^0 pCi/g with a 2-sigma of 0.00×10^0 and an MDA of 6.15×10^0 .

The reanalysis performed of RIN# 03S0013-005 001 revised the initially reported Ra-226 value from 9.60×10^0 with a 2-sigma of 2.10×10^0 and an MDA of 3.20×10^0 to a revised value of 5.32×10^0 pCi/g with a 2-sigma of 3.02×10^0 and an MDA of 3.20×10^0 .

Since Ra-226 is naturally occurring and not a DOE added isotope of concern at RFETS, it is not an isotope that is normally manually interference corrected and has been reported as qualitative and semi-quantitative information only.

A review of similar, previously analyzed metal coupon samples collected since August 2002 was performed. Other data from paint, concrete, and transite samples have also been reviewed to check for similar issues with the analysis. It has been determined that this anomaly was restricted to the metal coupon geometries of these two samples only. No further investigations or actions are required.

Based on the K-H responses, verbal Type 1 Facility RLCR concurrence for facilities 112 and 367 was obtained from D. Kruchek. B112 and 367 can be demolished upon asbestos abatement, as necessary. RLCR data issues with facilities T371D, T441A, T121A, 334 and 553 still need to be resolved with CDPHE and concurrence obtained prior to demolition. These additional issues are anticipated to be resolved during the next Weekly Area Status meeting scheduled for Dec 11th, 2002.

Contact Record 12/4/02
Rev 2/7/02

Contact Record Prepared By: D A Parsons

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